Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementing Kari's Law and Section 506 of RAY BAUM'S Act	)	PS Docket No. 18-261
	)	
	)	
Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems	)	PS Docket No. 17-239
	)	

COMMENTS OF BluIP INC.

Pursuant to the Federal Communications Commission ("Commission") notice of proposed rulemaking in the above captioned matters, BluIP, Inc. ("BluIP") respectfully submits these comments.[1] BluIP wholly supports the Commission's proposals to bring enhanced 911 ("E911") functionality to enterprises using multiline telephone systems ("MLTS").[2] As detailed below, BluIP currently provides cloud-based communications systems that enable direct 911 dialing, notifications and location information. BluIP focuses these comments on 911 solutions that it offers to the hospitality industry.

Background

BluIP provides cloud-based PBX, SIP trunking, AI-IVR, contact center, collaboration and communications solutions to various industries, including the hospitality industry. Its "Hosted Hospitality PBX and SIP Trunking" solutions are tailor-made to be used in hotels, resorts, extended stay and tenant properties throughout the country. Thus, BluIP can provide

[1] *Implementing Kari's Law and Section 506 of RAY BAUM'S Act*, Notice of Proposed Rulemaking, PS Dockets 18-261 & 17-239, FCC 18-132 (rel. September 26, 2018) (*"Notice"*).
[2] The Commission proposes to define MLTS to "include the full range of networked communications systems that serve enterprises, including circuit-switched and IP-based enterprise systems, as well as cloud-based IP technology and over-the-top applications." *Notice* at ¶ 29. BluIP agrees with this definition.

complete replacement of existing on-premises PBX systems with a cloud-based platform, or can augment existing, on-premises PBX systems. Both approaches enable BluIP to model each hotel room or hotel zone or user into its systems. Its platform effectively treats each hotel room as a separate user on its network. This allows BluIP to offer room-specific features such as DID numbers (for direct call back), occupation status, guest information, and room telephone control. BluIP increases 911 call location accuracy by integrating with the hotel's property management system ("PMS") to provide and transmit guest room status (occupied/not occupied), tower, floor, and room number to the PSAP operator or to hotel security, front desk employees and management. As an additional product offering, BluIP's BeHive Workstream Collaboration Communications and Common Operating Platform ("BeHive") provides information to a variety of designated recipients or groups and allows these parties to collaborate and communicate (voice, push-to-talk, chat, video, pictures, tasks) regarding the 911 call.

BluIP operates in geo-redundant data centers on carrier-grade infrastructure that enables "five nines" (99.999%) reliability along with security and provides at each location 4G LTE wireless services as a failover to ensure that E911 calls are delivered even when the hotel's data network is down, for example due to a fiber cut. BluIP currently serves over 290,000 hotel rooms in locations ranging in size from 50 rooms to thousands of rooms.

BluIP's Hosted Service Enables Direct 911 Dialing and Notification

Kari's Law requires MLTS manufactured, sold or newly installed after February 16, 2020 be configured to enable direct 911 dialing from all phones on the system.[3] BluIP's hosted PBX communications services already enable direct 911 dialing as a default configuration, even when

[3] Kari's Law has been added to the Communications Act of 1934 as Section 721 and codified 47 U.S.C. § 623 and 623 note.

combined with legacy PBX systems. Thus, all of BluIP's hospitality locations enable direct 911 dialing from guest room phones or any other hotel phone.

Kari's Law also requires that MLTS be configured to provide a notification to a central location at the facility where the system is installed or to another person or organization at another location. The law does not, however, indicate what information the notification should include. The Commission identifies several potential beneficiaries from such notifications: (1) the 911 caller by speeding response time; (2) the managers and staff of the enterprise who would be apprised of the notification and be more prepared to assist emergency responders when they arrive; and (3) the first responders who will be able to reach the caller more quickly.[4]

To achieve these benefits, the Commission proposes that the MLTS be configured to provide this notification contemporaneously with the 911 call and that it include certain information, such as the fact that a 911 call has been made, a valid call back number, which might include the specific extension from which the call was made; and dispatchable location information.[5] The Commission's intent is that this notification would include the same information being transmitted in the 911 call itself, to the extent feasible. The notification obligation would also apply to MLTS manufactured, sold or first installed after February 16, 2020.

BluIP concurs generally with these proposals. Its cloud-based platform enables highly robust on-site notifications of 911 calls or emergency alerts. These notifications can be conveyed in a variety of formats – text, voice, task, alerts – not only to security desks but simultaneously to various hotel personnel, hotel groups, off-site dispatch or first responders that have downloaded the BeHive app to their smart phones. Hotels do not need to replace or even

[4] *Notice* at ¶ 19
[5] *Id.* at ¶¶ 22-23.

upgrade existing on-premises PBX phone systems to obtain the benefit of these functionalities. Through BluIP's SIP trunking, the hotel can connect to BluIP's cloud-based platform and utilize these various features as an augment to the exiting PBX.

In light of this type of functionality, BluIP supports the Commission's suggestion to provide MLTS operators with "broad flexibility in selecting destination points" and in the manner which the notifications are conveyed.[6] Additionally, BluIP suggests the Commission consider the role of notifications more broadly. The Commission's focus is on the ability of MLTS to provide a notification simultaneously with a 911 call to the PSAP and that the notification provide the same level of detail that is provided to the PSAP. BluIP's platform, however, enables on-site notifications to include more information than may be feasibly, cost-effectively or usefully transmitted to the PSAP. For example, because BluIP's platform integrates with the hotel's PMS, on-site notifications can include not only room number and that room's telephone number, but whether the room is currently occupied and the name of the guest. Where hotels have a robust, on-site security operation, the inability to cost-effectively transmit some of this information to the PSAP may be less critical. Indeed some locations direct 911 calls to in-house security in the first instance.[7] Armed with this wealth of information, in-house security can be well prepared to assist first responders even if the PSAP call only provided a general street address and/or front office phone number. The Commission should thus retain flexibility in designing the notification obligation to take into account the capabilities at different locations, subject to a base-line obligation that notification of a 911 call be required.

[6] *Id.* at ¶ 24.

[7] Several comments submitted in the *ECS NOI* similarly note that directing 911 calls to on-site personnel may, in certain circumstances, be preferable to directing the call to a PSAP. *See, e.g., Comments of the Ad Hoc Telecommunications Users Committee*, PS Docket 17-239, at 5-6 (filed November 15, 2017) ("*Ad Hoc ECS NOI Comments*"); *Comments of AT&T*, PS Docket No. 17-239, at 3(filed November 15, 2017) ("*AT&T ECS NOI Comments*").

Dispatchable Location for MLTS

In addition to implementing the direct dialing and notification requirements set forth in Kari's law, the *Notice* proposes to implement Congress's directive in the RAY BAUM'S Act that the Commission consider adopting rules to "ensure that *dispatchable location* is conveyed with a 9-1-1 call" regardless of the technological platform used.[8] The statute defines dispatchable location as "the street address of the calling party, and additional information such as room number, floor number, or similar information necessary to adequately identify the location of the called party."

BluIP's "Hospitality Hosted PBX" solution is presently capable of providing the 911 caller's specific location information, such as room number, tower and floor, to on-site personnel and this information can also be conveyed to PSAP operators, even where the hotel has not replaced its legacy PBX phone system. This capability is consistent with a number of 911 providers that have previously noted their ability to collect and transmit such dispatchable location information.[9]

BluIP is also working with first responders to develop the technology to provide them in real time with the same information that is made available to on-site personnel. This could enable first responders to share the same degree of situational awareness, what BluIP calls a common operating picture, that on-site personnel have obtained through BluIP's BeHive product. The information could, for example, be made available to first responders over their smart phones. The Commission should seek to ensure that its rules and policies foster such

[8] *Notice* at ¶¶ 51, 53 (quoting RAY BAUM'S Act, § 506(a) (emphasis added by *Notice*).
[9] *See, e.g., Id.* at ¶ 93, n. 147 (citing comments).

innovations and not lock in any particular technology or processes that might discourage such innovation.

The Commission tentatively concludes that the cost of compliance with dispatchable location requirements would be minimal, and cites cost estimates by 911 service providers.[10] BluIP's cloud-based services are cost-effective and can be provided without significant capital expenditures since most hardware resides in the cloud. Nevertheless, costs may be a factor for some functionalities, such as conveying to the PSAP a room specific call back number. This functionality may require hotels to purchase DIDs for each room. Note that the cost of DIDs arises with respect to enabling the PSAP operator to make a call to the hotel room bypassing the hotels' central number. Some hotels, as a matter of policy may not wish to enable direct outside calling to rooms. At any rate, DID costs do not come into play when providing BluIP's on-site notification features. In assessing costs and benefits, the Commission may wish to consider whether on-site notifications that include the specific room and room's extension may, in certain circumstances, be sufficient if the cost of conveying a room specific call back number to the PSAP is excessive when compared to benefits.

Transitional Rules

The Commission proposes to adopt February 16, 2020 as the effective date for compliance with these requirements, including dispatchable location information. The Commission seeks comment on whether this date provides sufficient time to develop compliant MLTS systems. As noted above, BluIP already provides the capabilities for direct dialing and notifications, including location information, thus, from its perspective, the February 2020 deadline is more than sufficient. Moreover, as stated above, BluIP's solution can augment existing premises PBX's, which the Commission proposes to grandfather. BluIP suggests that

[10] *Notice* at ¶ 94.

Commission not simply excuse (or grandfather) existing systems until such time as they are replaced after February 2020, but consider requiring enterprises, or at least enterprises above a certain size, to modify their existing systems to come into compliance on or after February 2020 unless doing so would be overly burdensome. Cloud-based solutions do not require the replacement or expensive upgrades to existing telephone systems. Requiring compliance even for previously installed systems where SIP trunking can be provisioned would have the added benefit of further encouraging the use of IP-enabled cloud platforms to augment, if not immediately wholly replace, traditional circuit-switched TDM PBX on-site systems.

Conclusion

BluIP supports the Commission's proposals to bring E911 capabilities to MLTS, including to the hospitality sector. Cloud-based platforms presently offer the ability to cost-effectively provide detailed on-site notifications as well as to gather and convey call back numbers and dispatchable location information to PSAPs.

Respectfully submitted,

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